REMARKS

The Office action of January 15, 2004 has been received and its contents carefully noted.

Claims 1-11, and 25-32 are pending in the application. Claims 12-24 have been canceled without prejudice. Claims 1-11 have been amended rendering the previous rejections to Claims 3-7, and 9-12 moot under 35 U.S.C. § 112. Claims 25-32 have been added without the addition of any new matter.

Claims 1-2, 10, 14, and 17-21 stand rejected under 35 U.S.C. § 102(a) as being unpatentable over de Queiroz et al. ("Queiroz")(U.S. Patent No. 5,892,854). Claim 8 stand rejected under 35 U.S.C. § 103(a) in view of Queiroz. Claims 15-16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Queiroz in view of Kinjo (U.S. Patent No. 5,881,171). Applicant respectfully traverses these rejections, and requests allowance thereof in the continuation prosecution application for the following reasons.

The Claims are Patentable Over the Cited References

Claims 1-2, 10, 14, and 17-21 are not anticipated by Queiroz

Claims 1-2, 10, 14, and 17-21 stand rejected under § 102(a) in view of Queiroz. Queiroz fails to disclose the features recited in these claims as amended such as representing an object by deriving a plurality of peak coordinate values of a CSS representation of the object by smoothing an outline of the object in a plurality of

stages starting from an arbitrary point on the outline, and ordering the peak co-ordinate values of the CSS representation on the basis of peak height values of the plurality of peak co-ordinates, the peak height values corresponding to a parameter used for smoothing the outline.

Queiroz makes completely no mention of the recited feature of generating a CSS representation of an object by smoothing an outline of the object in a plurality of stages. In contrast, Queiroz solely describes an image characterization process that uses a binary moment procedure comprising rendering the scanned image object in binary bitmap form which is significantly distinct from using a CSS representation as recited. (see FIGs. 4-11, col. 8, lines 27-67). Generating a curvature scale space representation using smoothing of the object outline in a plurality of stages as recited is in complete contrast to the Queiroz procedure of generating a binary bitmap of the image object to characterize and represent the object.

Queiroz fails to disclose representing an object by deriving a plurality of peak coordinate values of a CSS representation of the object by smoothing an outline of the object in a plurality of stages starting from an arbitrary point on the outline making the claimed invention patentably distinct from the cited reference.

Claim 8 is not made obvious by Queiroz

Claim 8 stands rejected under § 103(a) in view of Queiroz. As

contended above, Queiroz fails to disclose using a curvature scale space representation in a plurality of stages as recited as in contrast Queiroz uses a binary moment procedure to represent an object. Queiroz fails to disclose the recited features making the claimed invention patentably distinct and non-obvious from the cited reference.

Claims 15-16 are not made obvious by Queiroz and Kinjo

Claims 15-16 have been canceled making this claim rejection moot.

Conclusion

In view of the amendments and remarks submitted above, it is respectfully submitted that all of the remaining claims are allowable and a Notice of Allowance is earnestly solicited.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayments to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§1.16 or 1.17; particularly, extension of time fees.

The Examiner is invited to contact the undersigned at (703) 205-8000 to discuss the application.

Respectfully submitted,

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